

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admissions *pro hac vice* pending)

PROPOSED ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Hon. Michael B. Kaplan

SHORT FORM APPLICATION TO ADMIT KATHLEEN A. FRAZIER *PRO HAC VICE*

TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST

PLEASE TAKE NOTICE that pursuant to Rule 2090-1 of the District of New Jersey

Local Bankruptcy Rules, Wollmuth Maher & Deutsch LLP, proposed co-counsel for Debtor, LTL Management LLC (the “Debtor”), hereby makes the application before the United States Bankruptcy Court for the District of New Jersey, for the entry of an Order admitting Kathleen A.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

Frazier of the law firm Shook, Hardy & Bacon, L.L.P. *pro hac vice* in the within proceeding to represent the Debtor.

The undersigned relies upon the Certification of Paul R. DeFilippo and the Order Allowing Kathleen A. Frazier to Appear as Proposed Co-Counsel for Debtor, *Pro Hac Vice* entered in the United States Bankruptcy Court for the District of New Jersey (Exhibit A),² in support of this application.

The undersigned hereby requests that, in accordance with D.N.J. LBR 2090-1, if no objection to the within application is filed within seven (7) days, the application be granted and the proposed form of Order be entered.

Dated: April 27, 2023
New York, New York

Respectfully submitted,

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo
Paul R. DeFilippo
500 Fifth Avenue, 12th Floor
New York, New York 10110
-and-
90 Washington Valley Road
Bedminster, New Jersey 07921
Tel: (212) 382-3300
Fax: (212) 382-0050
Email: pdefilippo@wmd-law.com

Proposed Co-Counsel for LTL Management LLC

² On April 20, 2023, the Court entered a text order abrogating the requirement of attaching supporting documents in lieu of attaching the prior Order admitting the applicant *pro hac vice* in the Debtor's first bankruptcy case captioned *In re LTL Management LLC*, Case No. 21-30589. See <http://www.njb.uscourts.gov/LTL>.